

ORIGINAL**Arizona Corporation Commission
Utilities Complaint Form**

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Investigator: Jenny Gomez**Phone:** <<< REDACTED >>>**Opinion Date:** 12/20/2016**Opinion Number:** 2016 - 136617**Priority:** Respond within 5 business days**Opinion Codes:** Rate Case Items - Opposed**Closed Date:** 12/20/2016 10:50 AM

Rate Case Items - Demand/ Opposed

First Name: Brandon**Last Name:** Guerra**Account Name:** Brandon Guerra**Address:** <<< REDACTED >>>**City:** Peoria**State:** AZ**Zip Code:** 85382**Cell:** <<< REDACTED >>>**Email:** <<< REDACTED >>>**Company:** Arizona Public Service Company**Division:** Electric**Nature Of Opinion****Docket Number:** E-01345A-16-0123**Docket Position:** Against

Hello, my name is Brandon Guerra and I live in Peoria. I am an AZ taxpayer and home owner, representing my own personal interests. Thank you for providing me the opportunity to speak today. I had something prepared this morning, but so much of what I planned to say has already been said, so I won't bother the commission by repeating it. I encourage the Commission to reject the ROO as it stands. This is because it significantly undervalues residential rooftop solar and the unique benefits that residential rooftop solar provides to ALL Arizona citizens. I see great issue with defining DG customers to be placed in a specific class and quite frankly, I find the notion to do so is discriminatory in nature. To be placed in a class means that all class members are alike. The commission needs to recognize that not all homes with rooftop solar panels are equal! Some are full time occupants and some are snowbirds. Some produce a tiny fraction of what they consume, they export zero kilowatt hours to the "bank." Others produce 100% or even more of what they consume. That surplus power that is backed into the grid IS ready for immediate consumption at FULL market rate. APS doesn't tell their ratepayers "3% of the power that you bought from us last month was made possible by your neighbor's overproduction, so we won't charge you for that." They are charged full market rate for that power even though they didn't produce it. Truth be told, they didn't really even distribute it, it traveled a few hundred feet down the street. The two methodologies presented in the ROO almost completely ignore the long-term benefits of rooftop solar and equate it to utility-scale solar, even though they are VERY different resources. For example, rooftop solar avoids the need for utilities to build expensive poles, transmission lines and costly infrastructure that reduces the costs for ALL ratepayers. I'm talking about substations, transformers, monitoring equipment, etc. APS already recognizes this benefit. This is why APS currently offers a program that places solar panels on west facing roofs in strategically selected areas where production and distribution capacity cannot easily satisfy community demand for energy. The customers who are lucky enough to qualify for this program DO NOT pay the monthly DG fee that their next-door neighbor who pays for their own investment. This program benefits the occupant for more than 5 years, and begs the question of which option provides the better "bang for the buck." What operating costs does APS have above and beyond the initial investment in the solar equipment on those specific homes? When Arizonans go solar, ALL ratepayers benefit from that system for its life expectancy of more than 20 years. The costs and benefits of solar must be considered over the course of that timeframe, not the artificially shorter timeline of 5-years as is included in the proposed decision. 20 years is probably not enough, but 5 years is certainly not enough. I appreciate that the ROO grandfathers current solar customers, but future customers deserve to make decisions in a policy atmosphere that provides some level of certainty surrounding the investment they make. Rooftop solar cannot be considered equivalent to utility-scale. It provides an entirely different set of benefits that all Arizonans can enjoy. I ask the Commission to thoughtfully consider how the recommended order equates utility scale benefits to those of rooftop solar and see that there are additional benefits like the avoided transmission and distribution costs along with the value

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the industry provides to thousands of Arizonans like me. Thank you for your time and I welcome your questions.

Date:	Analyst:	Investigation	Submitted By:	Type:
12/20/2016	Jenny Gomez	Telephone		Investigation
Noted and filed for the record in Docket Control.				
